

1 THOMAS D. DILLARD, JR., ESQ.
Nevada Bar No. 006270
2 **OLSON CANNON & GORMLEY**
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6 *Attorney for Defendants*
Shari Dixon, R.N. and
7 Pat Brown, R.N.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11
12 DAVID MONROE, an individual;

13 Plaintiff,

14 vs.

CASE NO. 2:23-cv-00677-JAD-EJY

15 SHARI DIXON, RN, individually;
16 PAT BROWN, RN, individually; JOHN R.
17 HOLMAN, MD, individually; SERGEANT
18 SCHEMANAUER, individually; DEPUTY
19 CHARLES, individually; DEPUTY
20 BARDEN, individually; DEPUTY
21 LAVEZZO, individually; DEPUTY RIKER,
22 individually; DEPUTY JAQUEZ,
23 individually; DEPUTY DRAGAS,
24 individually; DEPUTY MCLAUGHLIN,
25 individually; DEPUTY MARTINEZ,
26 individually; and DOES I through IX,
27 inclusive; and ROE CORPORATIONS
28 I through V, inclusive,

Defendants.

STIPULATION AND ORDER TO DISMISS WITH PREJUDICE

Law Offices of
OLSON CANNON & GORMLEY
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
(702) 384-4012 Fax (702) 383-0701

1 Plaintiff DAVID MONROE, an individual, ("Plaintiff") and Defendants SHARI
 2 DIXON, RN, individually, PAT BROWN, RN, individually, JOHN R. HOLMAN, MD,
 3 individually, SERGEANT SCHEMANAUER, individually, DEPUTY CHARLES, individually,
 4 DEPUTY BARDEN, individually, DEPUTY LAVEZZO, individually, DEPUTY RIKER,
 5 individually, DEPUTY JAQUEZ, individually, DEPUTY DRAGAS, individually, DEPUTY
 6 MCLAUGHLIN, individually, DEPUTY MARTINEZ, individually, and CLINTON THORNE,
 7 individually ("Defendants"), each acting by and through their undersigned counsel, hereby
 8 Stipulate and Agree pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii) that all claims and causes of action
 9 asserted by Plaintiff against Defendants, as set forth in the Plaintiff's Complaint shall be
 10 dismissed with prejudice, with each party to bear their own attorneys' fees and costs.

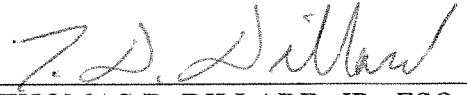
13 DATED this 22nd day of August, 2024.

DATED this 22nd day of August, 2024.

14 ATKINSON WATKINS &
 15 HOFFMANN, LLP

OLSON CANNON & GORMLEY

16
 17 BY: /s/ Tyler M. Crawford
 18 MATTHEW W. HOFFMANN, ESQ.
 19 TYLER M. CRAWFORD, ESQ.
 20 10789 W. Twain Ave., Suite 100
 Las Vegas, Nevada 89135
Attorneys for Plaintiff

BY: 
 THOMAS D. DILLARD, JR., ESQ.
 9950 W. Cheyenne Avenue
 Las Vegas, Nevada 89129
 Attorney for Defendants
 Shari Dixon, R.N. and Pat
 Brown, R.N.

21 ///

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23 ///

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DATED this 22nd day of August, 2024.

DATED this 22nd day of August, 2024.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

THORNDAL ARMSTRONG PC

By: /s/ Carol P. Michel
CAROL P. MICHEL, ESQ.
TRISHA R. DELOS SANTOS, ESQ.
6385 S. Rainbow Blvd., Suite 400
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Attorney for Defendant
John R. Holman, MD

BY: /s/ Katherine F. Parks
KATHERINE F. PARKS, ESQ.
6590 S. McCarran Blvd., Suite B
Reno, Nevada 89509
Attorney for Defendants
Jeff Schemanauer, Mark
Charles, Michael Barden,
Dominic Lavezzo, Payton
Riker, Suselly Jaquez, Tomasz
Dragas, Brady McLaughlin,
Thomas Martinez, and Clinton
Thorne

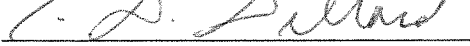
ORDER

IT IS SO ORDERED this ____ day of _____, 2024.

UNITED STATES DISTRICT JUDGE

Submitted by:

OLSON CANNON & GORMLEY

BY: 
THOMAS D. DILLARD, JR., ESQ.
Nevada Bar No. 006270
9950 W. Cheyenne Avenue
Las Vegas, Nevada 89129
Attorney for Defendants
Shari Dixon, R.N. and Pat
Brown, R.N.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22 day of August, 2024, I served the above

STIPULATION AND ORDER TO DISMISS WITH PREJUDICE through the CM/ECF system of the United States District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid), upon the following:

Matthew Hoffman, Esq.
Tyler M. Crawford, Esq.
ATKINSON WATKINS & HOFFMAN, LLP
10789 W. Twain Ave #100
Las Vegas, NV 89135
Attorney for Plaintiff

Katherine F. Parks, Esq.
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Attorney for Deputy Defendants
JEFF SCHEMANAUER, MARK CHARLES, MICHAEL BARDEN,
DOMINIC LAVEZZO, PAYTON RIKER, SUSELLY JAQUEZ,
TOMASZ DRAGAS, BRADY MCLAUGHLIN, THOMAS MARTINEZ,
and CLINTON THORNE

Carol P. Michel, Esq.
WEINBERG, WHEELER, HUDGINS,
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6385 S. Rainbow Boulevard, Suite 400
Las Vegas, Nevada 89118
Attorney for Defendant
JOHN R. HOLMAN, MD


An employee of OLSON CANNON & GORMLEY

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Nan Langenderfer

From: Tyler Crawford <tcrawford@awhlawyers.com>
Sent: Thursday, August 22, 2024 1:13 PM
To: Nan Langenderfer
Cc: Tom Dillard; Aideet Rogers
Subject: RE: Monroe v. Dixon, et al

Hi Nan:

You may use my e-signature on the stip.

Thanks ,

Tyler Crawford, Esq.

BATTLEBORN
INJURY LAWYERS

DBA of Atkinson Watkins
& Hoffmann LLP

702-562-6000

10789 W. Twain Ave, Ste 100
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675 W. Moana Ln, Ste 206
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From: Nan Langenderfer <nlangenderfer@ocgattorneys.com>
Sent: Thursday, August 22, 2024 11:44 AM
To: Tyler Crawford <tcrawford@awhlawyers.com>
Cc: Tom Dillard <tdillard@ocgattorneys.com>
Subject: RE: Monroe v. Dixon, et al

Good morning. I am following up on my prior email concerning the proposed Stipulation and Order for Dismissal with Prejudice. If acceptable, please advise if we can affix your /e/ signature.

Thank you.

Nan Langenderfer
Legal Assistant to Walter R. Cannon, Esq.,
Thomas D. Dillard, Jr.,
and Stephanie A. Barker, Esq.
Olson Cannon & Gormley
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Nan Langenderfer

From: Michel, Carol <CMichel@wwhgd.com>
Sent: Monday, August 12, 2024 5:06 PM
To: Nan Langenderfer; 'tcrawford@awhlawyers.com'; 'kfp@thorndal.com'
Cc: Tom Dillard
Subject: RE: Monroe v. Dixon, et al

Looks fine to me and you can affix my signature.



Carol P. Michel, Attorney
Weinberg Wheeler Hudgins Gunn & Dial
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From: Nan Langenderfer <nlangenderfer@ocgattorneys.com>
Sent: Monday, August 12, 2024 7:34 PM
To: 'tcrawford@awhlawyers.com' <tcrawford@awhlawyers.com>; 'kfp@thorndal.com' <kfp@thorndal.com>; Michel, Carol <CMichel@wwhgd.com>
Cc: Tom Dillard <tdillard@ocgattorneys.com>
Subject: RE: Monroe v. Dixon, et al

This Message originated outside your organization.

Counsel:

Attached please find proposed Stipulation and Order to Dismiss with Prejudice in the above matter. Please advise if we have your permission to affix your /e/ signature.

Thank you!

Nan Langenderfer
Legal Assistant to Walter R. Cannon, Esq.,
Thomas D. Dillard, Jr.,
and Stephanie A. Barker, Esq.

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Nan Langenderfer

From: Katherine F. Parks <KFP@thorndal.com>
Sent: Tuesday, August 13, 2024 8:30 AM
To: Nan Langenderfer; 'tcrawford@awhlawyers.com'; 'cmichel@wwhgd.com'
Cc: Tom Dillard
Subject: RE: Monroe v. Dixon, et al

Please feel free to file with my electronic signature.

Thank you,

Katherine F. Parks | President | Thorndal Armstrong, PC |
6590 S. McCarran Blvd., Suite B | Reno, NV 89509
(775) 786-2882 (phone) | (775) 786-8004 (fax)

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From: Nan Langenderfer <nlangenderfer@ocgattorneys.com>
Sent: Monday, August 12, 2024 4:34 PM
To: 'tcrawford@awhlawyers.com' <tcrawford@awhlawyers.com>; Katherine F. Parks <KFP@thorndal.com>; 'cmichel@wwhgd.com' <cmichel@wwhgd.com>
Cc: Tom Dillard <tdillard@ocgattorneys.com>
Subject: RE: Monroe v. Dixon, et al

Counsel:

Attached please find proposed Stipulation and Order to Dismiss with Prejudice in the above matter. Please advise if we have your permission to affix your /e/ signature.

Thank you!

Nan Langenderfer
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and Stephanie A. Barker, Esq.
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